FOR THE JUNIORS.

Falsely publishing that a person would be an anarchist if he thought it would pay is held in *Lewis v. Daily News Company* (Md.) 29 L. R. A. 59, to be libelous because it imputes the possession of moral obliquity and turpitude, which would cause all honest and upright people to shun the person thus stigmatized.

A statute prohibiting the employment of females more than eight hours per day or forty-eight hours per week in any factory or workshop is held in *Ritchie v. People*, 154 Ill. 98, 29 L. R. A. 79, to be unconstitutional as an arbitrary infringement of the right of individuals to make contracts, which is not justified by the police power.

That a hotel keeper is not liable for a theft by his night clerk, from the hotel safe, of money of a regular boarder who has lived in the house for some months, if ordinary care and diligence were used in employing the clerk, is decided in *Taylor v. Downey* (Mich.) 29 L. R. A. 92; and with the case is a note on the liability of a bailee for the wrongful appropriation by his servant of the thing bailed.

Occupancy of Wild Animals.—A man may acquire property in wild animals by killing or capturing them, provided that in so doing he is not a trespasser on another man's land. For title to property created by the act of reducing a thing into possession necessarily implies a reduction into possession effected by an act which is not in any way of a wrongful nature. Hence it follows that when A, a trespasser, kills a hare, *e. g.* on the land of B, A acquires no title to the hare, but the law makes it the property of B, the land owner, *ratione soli*. This was so decided in England in *Blades v. Higgs*, 11 H. of L. Cas. 621; and the law is so laid down in the United States in *Rexroth v. Coon*, 15 R. I. 35 (2 Am. St. Rep. 865). See also *Gillett v. Mason*, 7 Johns. 16; 2 Schouler Pers. Prop. sec. 17, note 3. But in Cooley on Torts (1st ed.) p. 436, the opinion is expressed that in the United States the title to a wild animal, following the civil law rule, would be held to be in the captor, even when such captor is a trespasser on another's land, citing *Taber v. Jenny*, 1 Sprague 315. *Sed quaere.* That A has no right, on the plea of destroying vermin, to hunt foxes, &c. on B's land without his consent, is held in England in *Paul v. Summerhayes*, 4 Q. B. D. 9, disapproving *Gundry v. Feltham*, 1 T. R. 334. And the law in the United States is to the same effect. *Glenn v. Kays*, 1 Bradw. (Ill.) 479; Bishop, Non-Contract Law, sec. 1248.

Construction of Express Warranty of "Soundness" of a Horse.—It was once held in England that a disease which was not calculated *permanently* to render a horse unfit for use, or *permanently* to diminish his usefulness, but which with ordinary care could be soon cured, did not amount to unsoundness so as to constitute a breach of warranty. See *Bolden v. Brogden*, 2 M. & R. 113, *per* Cole-